Case 1:17-cv-04275-LDH-RML Document 106 Filed 11/15/17 Page 1 of 2 PageID #: 1711

Case 1:17-cv-04275-LDH-RML Document 90-1 \*SEALED\* Filed 11/09/17 Page 2 of 3 PageID #: 1648

## Exhibit "4"

## Stipulation of Dismissal



UNITED STATES DISTRICT COURT	
EASTERN DISTRICT OF NEW YORK	¥
Allstate Insurance Company, et al.,	) 1:17-CV-04275
Plaintiffs,	) (LDH)(RML)
-AGAINST-	STIPULATION AND ORDER OF VOLUNTARY DISMISSAL WITH
ARTUR AVETISYAN, ET AL.,	PREJUDICE SOLELY AS TO
DEFENDANTS	LENNY KAGAN, AND VOORHIES HEALTH CARE
	PRODUCTS, INC.

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel, as follows:

- 1. Any and all claims and defenses by and between Allstate Insurance Company, Allstate Fire & Casualty Insurance Company, Allstate Indemnity Company, Allstate New Jersey Insurance Company, Allstate New Jersey Property and Casualty Insurance Company, Allstate Property & Casualty Insurance Company, and Northbrook Indemnity Company (collectively "Plaintiffs") and Lenny Kagan, and Voorhies Health Care Products, Inc. ("Defendants") are hereby voluntarily dismissed, with prejudice, pursuant to Fed. R. Civ. P. 41(a)(2).
  - 2. Plaintiffs and Defendants shall pay their own costs and attorneys' fees.
- 3. This Stipulation and Order of Voluntary Dismissal is solely limited to discontinuing claims by and between the parties hereto with regard to this action.
- 4. The Court shall retain jurisdiction and authority over any disputes relating to the enforcement of the settlement agreement entered into by the Plaintiffs and Defendants to this Stipulation and Order of Voluntary Dismissal.

## 

Case 1:17-cv-04275-LDH-RML Document 90-1 \*SEALED\* Filed 11/09/17 Page 3 of 3 PageID #: 1649

Dated: New York, New York November 9, 2017

## MORRISON MAHONEY LLP

/s/ Lee Pinzow By:

Robert A. Stern, Esq.

James A. McKenney, Esq.

Lee Pinzow, Esq.

120 Broadway, Suite 1010.

New York, New York 10271

Allstate Insurance Company, Allstate

Fire & Casualty Insurance Company,

Allstate Indemnity Company, Allstate

New Jersey Insurance Company, Allstate

New Jersey Property and Casualty

Insurance Company, Allstate Property

& Casualty Insurance Company, and Northbrook Indemnity Company

LAW OFFICE OF LEON KUCHEROVSKY, ESQ

Leon Kucherovsky, Esq.

David Forman, Esq.

115 South Corona Avenue

Valley Stream, New York 11580

Counsel for Defendants Lenny Kagan,

and Voorhies Health Care Products, Inc.

SOORDERED

s/LaShann DeArcy Hall

LaShann DeArcy Hall, U.S.D.J.

Dated: November 13, 2017